

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**Phend & Brown, Inc.
Fulton Wabash County Line Road 0.5 MI. N. of SR 114 near
Disko, Indiana 46927**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F049-14038-03137	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 3, 2002 Expiration Date: April 3, 2007

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [I13-14-2-2]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.8 Stack Height [326 IAC 1-7]
- C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-8-4(3)]

- C.10 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
- C.14 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.15 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

One aggregate batch mix dryer

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]
- D.1.2 Particulate Matter (PM) [326 IAC 12][40 CFR 60.90, Subpart I]
- D.1.3 Opacity [326 IAC 12][40 CFR 60.90, Subpart I]
- D.1.4 Particulate Matter less than micron (PM-10) [326 IAC 2-8-4]
- D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]
- D.1.6 No. 2 Fuel Usage and Equivalents [326 IAC 2-8-4]
- D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
- D.1.9 Particulate Matter and PM-10
- D.1.10 Sulfur Dioxide and Sulfur Content
- D.1.11 Used Oil Requirements

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.12 Visible Emissions Notations
- D.1.13 Parametric Monitoring
- D.1.14 Baghouse Inspections
- D.1.15 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.16 Record Keeping Requirements
- D.1.17 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Cold Mix Asphalt Storage

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-2][326 IAC 2-8-4][326 IAC 2-2][40 CFR 52.21]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

D.2.3 Reporting Requirements

Certification Form

Emergency Occurrence Form

Quarterly Report Form

Quarterly Report Form

Quarterly Deviation and Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary batch mix asphalt plant.

Authorized Individual:	Daniel F. Brown
Source Address:	Fulton Wabash County Line Road, 0.5 Mi. N. of SR 114, near Disko, Indiana 46927
Mailing Address:	P.O. Box 150, Milford, Indiana 46542
SIC Code:	2951
County Location:	Fulton
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) asphalt batch dryer mixer, constructed in 1965, with a maximum capacity of 160 tons per hour, equipped with one (1) No. 4 fuel fired aggregate dryer burner, installed in 1998, with a maximum rated capacity of 75.6 million (MM) Btu per hour, using No. 2 fuel oil and waste oil as back-up fuels, and one (1) baghouse dust collecting system for particulate matter control, exhausting at one (1) stack, identified as SV1;
- (b) one (1) 5' x 10' 3-deck screen;
- (c) two (2) conveyors to transfer aggregates from feed bins to asphalt dryer; and
- (d) production of cold-mix (stock pile mix) asphalt concrete.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) distillate No. 2 fuel oil fired liquid asphalt tank heater, with a maximum capacity of 1.4 MMBtu/hr, exhausting at one (1) stack, identified as SV2;
- (b) four (4) raw aggregate storage piles with a total storage capacity of 22,000 tons;
- (c) one (1) reclaimed asphalt pavement storage pile with a total storage capacity of 3,200 tons;
- (d) one (1) 1,000 gallon No. 2 fuel oil storage tank identified as SV3 and constructed in 1988;

- (e) two (2) 10,000 gallon asphalt cement storage tanks identified as SV4 and SV5 and constructed in 1984;
- (f) one (1) 10,000 gallon asphalt emulsion storage tank identified as SV6 and constructed in 1984;
- (g) one (1) 8,000 gallon No. 4 fuel oil storage tank identified as SV7 and constructed in 1984;
- (h) one (1) 8,000 gallon No. 2 fuel oil storage tank identified as SV8 and constructed in 1984;
- (i) one (1) reclaimed asphalt storage bin with conveyer;
- (j) unpaved roads with public access;
- (k) four (4) virgin aggregate feeder bins;
- (l) one (1) bucket elevator with 18" x 18" buckets; and
- (m) one (1) recycled asphalt product feeder.
- (n) The following VOC and HAP storage containers:
Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (o) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2kPa; 15mmHg; or 0.3 psi measured at 38°C (100 °F) or;
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ , in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) one (1) asphalt batch dryer mixer, constructed in 1965, with a maximum capacity of 160 tons per hour, equipped with one (1) No. 4 fuel fired aggregate dryer burner, installed in 1998, with a maximum rated capacity of 75.6 million (MM) Btu per hour, using No. 2 fuel oil and waste oil as back-up fuels, and one (1) baghouse dust collecting system for particulate matter control, exhausting at one (1) stack, identified as SV1;
- (b) one (1) 5' x 10' 3-deck screen; and
- (c) two (2) conveyors to transfer aggregates from feed bins to asphalt dryer.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3] [326 IAC 12] [40 CFR Part 60.90]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 60, Subpart I.

D.1.2 Particulate Matter (PM) [326 IAC 12] [40 CFR 60.90, Subpart I] [326 IAC 2-2]

Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 11.76 pounds per hour based on an exhaust rate of 46,584 actual cubic feet per minute (acfm) and an exhaust temperature of 225 degrees Fahrenheit (EF) for the batch mix dryer. Compliance with this limit shall limit the source's potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.3 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.92, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the mixing and drying operations shall not discharge or cause the discharge into the atmosphere any gases which exhibit 20 percent opacity or greater.

D.1.4 Particulate Matter Less Than 10 Microns (PM-10) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, PM-10 emissions from the aggregate mixing and drying operation shall be limited to 0.1289 pounds of PM-10 emitted per ton of asphalt produced, equivalent to 20.62 pounds per hour, including both filterable and condensable fractions. Compliance with this limit shall limit the source's potential to emit of PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 75.6 million British thermal units per hour burner for the aggregate batch mix dryer shall be limited to 0.5 and 1.6 pounds per MMBtu heat input for No. 4 (or No. 2) fuel oil and waste oil, respectively. This is equivalent to a sulfur content of less than or equal to 0.5 percent when using No. 4 (or No. 2) fuel oil and 1.5 percent when using waste oil, respectively.

Pursuant to 326 IAC 7-1.1-2, this sulfur dioxide limit applies at all times including periods of startup, shutdown, and malfunction. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.6 No. 4 Fuel Usage and Equivalents [326 IAC 2-8] [326 IAC 2-2]

The input of No. 4 fuel oil to the 75.6 MMBtu/hr burner for the aggregate dryer based on a maximum fuel oil sulfur content of 0.5 percent shall be limited, to 2,413,763 gallons per twelve (12) consecutive month period. For the purposes of calculating equivalent No. 4 fuel oil consumption from back-up fuels, based on SO₂ emissions, the following conversion factors shall be utilized:

- (a) 1 kgal of No. 2 distillate fuel oil (based on 0.5% sulfur) = 0.9277 kgal of No. 4 distillate fuel oil;
- (b) 1 kgal of waste oil (based on 1.2% sulfur) = 2.352 kgal of No. 2 fuel oil.
- (c) Sulfur content of waste oil shall not exceed 1.2% by weight.

Therefore, the requirements of 326 IAC 2-7 will not apply.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 to 36 months after issuance of this permit, the Permittee shall perform the following to demonstrate compliance with Conditions D.1.2 , D.1.3 and D.1.4 for the batch-mix aggregate dryer:

- (a) PM and PM-10 testing utilizing methods per 40 CFR Part 60 Appendix A, Method 5 for PM and methods, as approved by the Commissioner for PM-10. PM-10 includes filterable and condensable PM-10.
- (b) Opacity testing utilizing 40 CFR Part 60 Appendix A, Method 9, to demonstrate compliance with the opacity limitation of Condition D.1.3.

This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.9 Particulate Matter (PM)

The baghouse for PM and PM10 control shall be in operation at all times when the aggregate dryer and burner are in operation.

D.1.10 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.5 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed 0.5 pounds per million Btu heat input when firing No. 4 (or No. 2) fuel oil, and 1.6 pounds per million Btu heat input when firing waste oil:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or

- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 75.6 MMBtu per hour burner, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.11 Used Oil Requirements [329 IAC 13]

The waste oil burned in the aggregate dryer burner shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Visible Emissions Notations

- (a) Visible emission notations of the mixing and drying operation stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in controlling the mixing and drying operations, at least once per shift when the mixing and drying process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the permittee shall take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.14 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the batch mix aggregate mixing/drying operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.15 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.16 Record Keeping Requirements

- (a) To document compliance with the No. 4 fuel oil limit and SO₂ emission limit established in Conditions D.1.5, D.1.6, and D.1.10 the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO₂ emission limit established in conditions D.1.5 and D.1.6.

- (1) Calendar dates covered in the compliance determination period;
- (2) Monthly fuel usages;
- (3) Average heating value of the fuels;
- (4) Average sulfur dioxide (SO₂) emission rate for each fuel oil type combusted per month (pounds SO₂ per million Btu)
- (5) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (6) Fuel supplier certifications;
- (7) The name of the fuel supplier; and
- (8) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with condition D.1.12, the Permittee shall maintain records of once per shift visible emission notations of the mixing and drying operation stack exhaust, and conveyors, storage piles, and unpaved roads, once per shift.

- (c) To document compliance with Condition D.1.13, the Permittee shall maintain the following:

Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

- (1) Inlet and outlet differential static pressure.

- (d) To document compliance with Condition D.1.14, the Permittee shall maintain records of the results of the inspections required under Condition D.1.14 and the dates the vents are redirected.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.6 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) production of cold-mix (stock pile mix) asphalt concrete.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-8-4][326 IAC 2-2][40 CFR 52.21]

Liquid binders used in the production of cold mix asphalt at this source are defined as follows:

- (1) Cut back asphalt medium cure, containing a maximum of 28.6% of the liquid binder by weight of VOC (solvent) and 70% by weight of VOC (solvent) evaporating.
- (2) Cut back asphalt slow cure, containing a maximum of 20% of the liquid binder by weight of VOC (solvent) and 25% by weight of VOC (solvent) evaporating.
- (3) Emulsified asphalt with solvent, containing a maximum of 15% of liquid binder by weight of VOC solvent and 46.4% by weight of the VOC (solvent) in the liquid blend evaporating. The percent oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
- (4) Other asphalt with solvent binder, containing a maximum 25.9% of the liquid binder of VOC (solvent) and 2.5% by weight of the VOC (solvent) evaporating.

The VOC solvent usage per twelve (12) consecutive month period rolled on a monthly basis shall be adjusted when more than one type of binder is used. In order to determine the tons of VOC emitted per each type of binder, use the following formula and divide the tons of VOC solvent used for each type of binder by the corresponding adjustment ratio.

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment ratio}} = \text{tons of VOC emitted}$$

Adjustment Ratio: cutback asphalt medium cure = 1.36; cutback asphalt slow cure = 3.8; emulsified asphalt = 2.04; other asphalt = 38.

Total VOC emissions from the cold mix storage operations shall not exceed 93.15 tons per twelve (12) consecutive month period rolled on a monthly basis (based on: 99.0 - VOC emissions from aggregate drying and fuel combustion). Compliance with this condition will limit source-wide VOC to less than 100 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) are not applicable.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

To document compliance with Condition D.2.1(b), the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1(b).

- (a) Calendar dates covered in the compliance determination period;
- (b) Cold-mix (stock pile mix) asphalt binder usage per month since the last compliance determination period;
- (c) VOC solvent content by weight of the cold-mix (stock pile mix) asphalt binder used each month; and
- (d) Amount of VOC solvent used in the production of cold mix asphalt, and the amount of VOC emitted each month.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Phend & Brown, Inc.
Source Address: Fulton Wabash County Line Road 0.5 mile North of State Road 114 near Disko,
Indiana 46927
Mailing Address: P.O. Box 150, Milford, Indiana 46542
FESOP No.: F 049-14038-03137

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Phend & Brown, Inc.
Source Address: Fulton Wabash County Line Road 0.5 mile North of State Road 114 near Disko,
Indiana 46927
Mailing Address: P.O. Box 150, Milford, Indiana 46542
FESOP No.: F 049-14038-03137

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Phend & Brown, Inc.
Source Address: Fulton Wabash County Line Road 0.5 mile North of State Road 114 near Disko,
Indiana 46927
Mailing Address: P.O. Box 150, Milford, Indiana 46542
FESOP No.: F 049-14038-03137
Facility: 75.6 MMBtu per hour burner for the batch mix dryer
Parameter: SO₂ fuel oil consumption limitations
Limit: Sulfur content of No. 4 fuel oil and No. 2 fuel oil not to exceed 0.50 percent, and
sulfur content of waste oil not to exceed 1.2 percent; 2,413, 763 gallons of No. 4
fuel oil and No. 4 fuel oil equivalent combined per last 12-month period. For
purposes of determining equivalent No. 4 fuel oil consumption from back-up fuels,
the following conversion factors shall be utilized:
(1) 1 kgal of No. 2 distillate fuel oil (based on 0.5% sulfur) = 0.9277 kgal of
No. 4 fuel oil;
(2) 1 kgal of waste fuel oil (based on 1.2% sulfur) = 2.352 kgal of No. 4 fuel
oil.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	No.4 (+ equivalents) usage this month (gallons per month)	No.4 (+ equivalents) usage for previous 11 months (gallons)	No.4 (+ equivalents) usage for last 12 months (gallons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Phend & Brown, Inc.
Source Address: Fulton Wabash County Line Road 0.5 mile North of State Road 114 near Disko,
Indiana 46927
Mailing Address: P.O. Box 150, Milford, Indiana 46542
FESOP No.: F 049-14038-03137
Facility: Cold-mix (stock pile mix) asphalt
Parameter: VOC emissions from binder used in the production of cold mix asphalt
Limit: VOC: 93.15 tons per twelve (12) consecutive month period, rolled on monthly basis,
and calculated as follows:

Sum of (**Tons of solvent contained in binder**) different binders = tons of VOC emitted
Adjustment ratio

Adjustment Ratio: cutback asphalt medium cure = 1.36; cutback asphalt slow cure = 3.8;
emulsified asphalt = 2.04; other asphalt = 38.

YEAR: _____

Month	VOC Emissions (Tons per Month)	VOC Emissions Previous 11 Months (Tons)	VOC Emissions Last 12 Months (Tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Phend & Brown, Inc.
Source Address: Fulton Wabash County Line Road 0.5 mile North of State Road 114 near Disko,
Indiana 46927
Mailing Address: P.O. Box 150, Milford, Indiana 46542
FESOP No.: F 049-14038-03137

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Phend & Brown, Inc.
Source Location: Fulton Wabash County Line Road, 0.5 Mi. N. of SR 114, near Disko, Indiana 46927
County: Fulton
SIC Code: 2951
Operation Permit No.: F049-14038-03137
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Phend & Brown, Inc. relating to the operation of a stationary batch hot mix asphalt plant. Phend & Brown, Inc. was issued FESOP 049-6486-03137 on December 11, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) asphalt batch dryer mixer, constructed in 1965, with a maximum capacity of 160 tons per hour, equipped with one (1) No. 4 fuel fired aggregate dryer burner, installed in 1998, with a maximum rated capacity of 75.6 million (MM) Btu per hour, using No. 2 fuel oil and waste oil as back-up fuels, and one (1) baghouse dust collecting system for particulate matter control, exhausting at one (1) stack, identified as SV1;
- (b) one (1) 5' x 10' 3-deck screen;
- (c) two (2) conveyors to transfer aggregates from feed bins to asphalt dryer; and
- (d) production of cold-mix (stock pile mix) asphalt concrete.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) one (1) distillate No. 2 fuel oil fired liquid asphalt tank heater, with a maximum capacity of 1.4 MMBtu/hr, exhausting at one (1) stack, identified as SV2;
- (b) four (4) raw aggregate storage piles with a total storage capacity of 22,000 tons;
- (c) one (1) reclaimed asphalt pavement storage pile with a total storage capacity of 3,200 tons;

- (d) one (1) 1,000 gallon No. 2 fuel oil storage tank identified as SV3 and constructed in 1988;
- (e) two (2) 10,000 gallon asphalt cement storage tanks identified as SV4 and SV5 and constructed in 1984;
- (f) one (1) 10,000 gallon asphalt emulsion storage tank identified as SV6 and constructed in 1984;
- (g) one (1) 8,000 gallon No. 4 fuel oil storage tank identified as SV7 and constructed in 1984;
- (h) one (1) 8,000 gallon No. 2 fuel oil storage tank identified as SV8 and constructed in 1984;
- (i) one (1) reclaimed asphalt storage bin with conveyer;
- (j) unpaved roads with public access;
- (k) four (4) virgin aggregate feeder bins;
- (l) one (1) bucket elevator with 18" x 18" buckets; and
- (m) one (1) recycled asphalt product feeder.
- (n) The following VOC and HAP storage containers:
Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (o) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2kPa; 15mmHg; or 0.3 psi measured at 38°C (100 °F) or;
 - (B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

Existing Approvals

- (a) FESOP 049-6486-03137, issued on December 11, 1996; and expires on December 11, 2001.
- (b) First Significant Modification 049-9404-03137, issued on May 27, 1998.
- (c) First Minor Permit Revision 049-11812-03137, issued on March 16, 2000.

All conditions from previous approvals were incorporated into this FESOP except the following:

First Minor Permit Revision 049-11812-03137, issued on March 16, 2000.

D.1.1 Particulate Matter

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the mixing and drying operation shall not exceed 56.1 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4 (FESOP), the PM10 emissions from the mixing and drying operation shall not exceed 17.82 pounds per hour.

Reason Not Incorporated: The aggregate mixing and drying operation is not subject to the requirements of 326 IAC 6-3-2. This rule does not apply if the limitation established in the rule is not consistent with applicable limitations in 326 IAC 12, 40 CFR 60, Subpart I. Since the applicable PM limits established by 326 IAC 12, 40 CFR 60, Subpart I, are less than the PM limits that would be established by 326 IAC 6-3-2, the more stringent limits apply and the limits pursuant to 326 IAC 6-3-2 do not apply (see TSD Appendix A pages 14 of 16, for details). PM-10 emission limits are also revised to reflect the changes in equations to calculate fugitive emissions from unpaved roads and storage operations.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 7, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 11).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	22,637.01
PM-10	3,291.53
SO ₂	420.27
VOC	9,811.90
CO	12.05
NO _x	48.18

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Acetaldehyde	less than 10
Arsenic	less than 10
Benzene	less than 10
Beryllium	less than 10
Cadmium	less than 10
Chromium	less than 10
Ethyl benzene	less than 10
Formaldehyde	less than 10
Lead	less than 10
Manganese	less than 10
Mercury	less than 10
Nickel	less than 10
Quinone	less than 10
Toluene	less than 10
Polycyclic Organic Matter	less than 10
Xylene	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter (PM-10), sulfur dioxide (SO₂), and volatile organic compounds (VOC) are each greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 11, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F049-6486-03137; issued on December 11, 1996).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Batch mix aggregate dryer/mixer	51.49 ⁽²⁾	90.33 ⁽³⁾	90.52	5.84	6.50	26.02	5.34 (total) 1.89 (single)
Cold mix storage	-	-	-	93.15	-	-	-
Hot oil heater*	0.09	0.04	3.05	0.01	0.22	0.88	negl.
Conveying/ handling*	3.85 ⁽¹⁾	1.83 ⁽¹⁾	-	-	-	-	-
Unpaved roads *	25.96 ⁽¹⁾	6.75 ⁽¹⁾	-	-	-	-	-
Storage *	0.14 ⁽¹⁾	0.05 ⁽¹⁾	-	-	-	-	-
Total Non-Fugitive PTE After Issuance	81.53	99.0	93.57	99.0	6.72	26.90	5.34 (total) 1.89 (single)

* Insignificant activities

(1) Fugitive emissions after control.

(2) Maximum allowable PM emissions based on NSPS Subpart I PM limit of 0.04 gr/dscf.

(3) Maximum allowable PM10 emissions in order to comply with 326 IAC 2-8 (FESOP).

County Attainment Status

The source is located in Fulton County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Fulton County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no new federal rules applicable to this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 003-5807-03125; issued on December 11, 1996.

- (a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.90, Subpart I) because it meets the definition of a hot mix asphalt facility pursuant to the rule and it was modified after June 11, 1973 (75.6 MMBtu/hr burner replaced the original permitted 46.0 MMBtu/hr burner under SMF 049-9404, issued on May 27, 1998). This rule limits particulate matter emissions to 0.04 grains per dry standard cubic foot (gr/dscf) and also limits visible emissions to 20% opacity. The emission limit is equivalent to a particulate matter emission rate of 11.76 pounds per hour based on an exhaust rate of 46,584 actual cubic feet per minute (acfm) and an exhaust temperature of 225 degrees Fahrenheit (EF) for the aggregate mix dryer. The source will comply with this rule by using a baghouse to limit particulate matter emissions to less than 0.04 gr/dscf (see Appendix A, page 9 of 11, for detailed calculations).
- (b) The three (3) 10,000 gallon storage tanks (SV4, SV5 and SV6, constructed in 1984), the two (2) 8,000 gallon tanks (SV7 and SV8, constructed in 1984) and one (1) 1,000 gallon No. 2 fuel oil storage tank (SV3, constructed in 1988), are not subject to the requirements of 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since each have capacities of less than 40 cubic meters (m³) (10,567 gallons), and are therefore not subject to this rule.
- (c) The asphalt plant is not subject to the New Source Performance Standard 326 IAC 12 (40CFR 60.670 through 60.676, Subpart OOO) "Standards of Performance for Nonmetallic Mineral Processing Plants" for recycled asphalt pavement (RAP) usage since the RAP is received onsite ready-to-use, and there is no crushing or grinding of the RAP prior to loading into the first storage silo/bin.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

There are no new state rules applicable to this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 049-6486-03137; issued on December 11, 1996.

326 IAC 2-6 (Emission Reporting)

This source is located in Fulton County which is not one of the specifically listed counties, nor does this FESOP source have the potential to emit CO, VOC, NO_x, PM₁₀ (including fugitive emissions), or SO₂ in amounts at or exceeding one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-6 still do not apply to the source.

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (PSD), this source, with the modification of dryer burner (permitted under SMF 049-9404) performed in 1998, after the 326 IAC 2-2 August 7, 1980 rule applicability date, is still not considered a major source because it is not one of the 28 listed source categories and shall continue to be limited as follows. PM emissions from batch-mix aggregate mixing and drying shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf), which is equivalent to a particulate matter emission rate of 11.76 pounds per hour. PM-10 shall be limited as described under the *FESOP* section below. These limits are required to limit the source-wide potential to emit of PM and PM-10 to less than 250 and 100 tons per twelve (12) consecutive month period, respectively, such that the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) are not applicable.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂ and VOC emitted from the source shall be limited to less than one hundred (100) tons per year, each. Additionally, the source shall comply with the following specific emission and/or production limitations:

- (a) The source shall limit input to the dryer burner of No. 4 fuel oil (not to exceed 0.5% sulfur content) plus No. 4 distillate fuel equivalents to 2,413,763 gallons per 12 consecutive month period. For the purposes of calculating equivalent No. 4 fuel oil consumption from back-up fuels, based on SO₂ emissions, the following conversion factors shall be utilized (see Appendix A: Emission Calculations, page 7 of 11 for details on equivalency derivation):
 - (1) 1 kgal of No. 2 distillate fuel oil (not to exceed 0.5% sulfur) = 0.9277 kgal of No. 4 fuel oil;
 - (2) 1 kgal of waste fuel oil (not to exceed 1.2% sulfur) = 2.352 kgal of No. 4 fuel oil.
- (b) Sulfur content of No. 4 fuel oil shall not exceed 0.4% by weight.
- (c) Sulfur content of waste fuel oil shall not exceed 1.2% by weight.
- (d) Liquid binders used in the production of cold mix asphalt at this source consist of medium cure, slow cure, emulsified and gelled asphalt and are defined as follows:
 - (1) Cut back asphalt medium cure, containing a maximum of 28.6% of the liquid binder by weight of VOC (solvent) and 70% by weight of VOC (solvent) evaporating.
 - (2) Cut back asphalt slow cure, containing a maximum of 20% of the liquid binder by weight of VOC (solvent) and 25% by weight of VOC (solvent) evaporating.
 - (3) Emulsified asphalt with solvent, containing a maximum of 15% of liquid binder by weight of VOC solvent and 46.4% by weight of the VOC (solvent) in the liquid blend evaporating. The percent oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
 - (4) Other asphalt with solvent binder, containing a maximum 25.9% of the liquid binder of VOC (solvent) and 2.5% by weight of the VOC (solvent) evaporating.

The VOC solvent usage per twelve (12) consecutive month period rolled on a monthly basis shall be adjusted when more than one type of binder is used. In order to determine the tons of VOC emitted per each type of binder, use the following formula and divide the tons of VOC solvent used for each type of binder by the corresponding adjustment ratio.

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment ratio}} = \text{tons of VOC emitted}$$

Adjustment Ratio: cutback asphalt medium cure = 1.36; cutback asphalt slow cure = 3.8; emulsified asphalt = 2.04; other asphalt = 38.

Total VOC emissions from the cold mix storage operations shall not exceed 93.15 tons per twelve (12) consecutive month period rolled on a monthly basis (based on: 99.0 - VOC emissions from aggregate drying and fuel combustion). Compliance with this condition will limit source-wide VOC to less than 100 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable.

- (c) PM-10 emissions from the aggregate dryer shall not exceed 20.62 pounds per hour (equivalent to the emission factor of 0.1289 pounds PM-10 per ton of asphalt processed). The source will comply with the PM-10 emission limit by utilizing a baghouse for controlling PM-10 emissions from the aggregate dryer to less than 20.62 pounds per hour. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). No facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) still do not apply to this source.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new sources constructed after December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. The source was constructed in 1965, therefore the requirements of 326 IAC 6-5 do not apply.

State Rule Applicability - Individual Facilities

There are no new state rules applicable to this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 049-6486-03137; issued on December 11, 1996.

326 IAC 6-3-2 (Process Operations)

The aggregate mixing and drying operation is not subject to the requirements of 326 IAC 6-3-2. This rule does not apply if the limitation established in the rule is not consistent with applicable limitations in 326 IAC 12, 40 CFR 60, Subpart I. Since the applicable PM limits established by 326 IAC 12, 40 CFR 60, Subpart I, are less than the PM limits that would be established by 326 IAC 6-3-2, the more stringent limits apply and the limits pursuant to 326 IAC 6-3-2 do not apply (see TSD Appendix A pages 9 of 11, for details).

326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

The aggregate dryer burner is subject to 326 IAC 7-1.1 because it has potential SO₂ emissions of greater than 25 tons per year (limited potential emissions are 93.57 tons per year). Pursuant to this rule, sulfur dioxide emissions from the 75.6 MMBtu/hr dryer burner shall be limited to 0.5 and 1.6 pounds per MMBtu heat input for No. 4 (or No. 2) fuel oil and waste oil, respectively. This is equivalent to a sulfur content for less than or equal to 0.5 percent when using No. 4 (or No. 2) fuel oil and 1.5 percent when using waste oil, respectively (see Appendix A: Emission Calculations, page 9 of 11). All fuels used by the batch dryer mixer are in compliance with the aforementioned sulfur content limits, therefore the batch dryer mixer is in compliance with this rule.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

Pursuant to this rule, the source shall submit reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate (pounds SO₂ per MMBtu), to the OAQ upon request.

326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving)

The source is not subject to this rule. This rule applies to all asphalt paving application made after January 1, 1980. This source pre-dates this rule, therefore, 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving) does not apply.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1 (Applicability) and 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (39,000 gallons) containing VOC whose true vapor pressure is greater than 10.5 kPa (1.52 psi) shall comply with the requirements for external fixed and floating roof tanks and the specified record keeping and reporting requirements. Each of the storage tanks at this source are not subject to IAC 8-4-3 because their capacities are less than the rule applicability threshold capacity of 39,000 gallons.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. This source is located in Fulton County. Therefore, this rule is not applicable to this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. The asphalt and fuel storage tanks at the source are not subject to IAC 8-9 because they are stationary vessels that are not located in a specified county.

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP. This source is subject to 40 CFR 60, Subpart I (Standards of Performance for Hot Mix Asphalt Facilities), and shall comply with the particulate matter (PM) and opacity compliance testing requirements of the rule for the hot mix asphalt plants. OAQ has also required PM-10 testing to demonstrate FESOP compliance.

Previous stack tests to comply with this requirement were conducted as follows:

- (a) PM and PM-10, and opacity testing was performed in September 2001.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP, except the frequencies for visible emission notations and baghouse pressure drop readings have been changed to once per shift.

Reason changed: Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Baghouse failure can occur suddenly; therefore monitoring of baghouse operational parameters should be more frequent than weekly or even daily in such cases where a source operates more than one shift per day. The OAQ believes that changing visible emissions notations to once per operating shift is a reasonable requirement. Therefore, the requirements to perform visible emissions notations have been changed from weekly to once per shift. This change likewise applies to the pressure drop readings. The compliance monitoring requirements applicable to this source are as follows: The compliance monitoring requirements applicable to this source are as follows:

1. The mixing and drying operation has applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the batch-mix aggregate dryer/burner baghouse stack exhaust, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.
 - (b) The Permittee shall record the total static pressure drop across the baghouse controlling the batch-mix aggregate dryer, at least once per shift when the respective aggregate dryer is in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 1.0 to 8.0 inches of water or a range established during the latest stack test.
 - (c) An inspection shall be performed each calendar quarter of all bags controlling the batch-mix aggregate mixing and drying operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses for the aggregate mixing and drying process must operate properly to ensure compliance with 326 IAC 12, 40 CFR 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Facilities) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this batch hot mix asphalt plant shall be subject to the conditions of the attached proposed **FESOP Renewal No.: 049-14038-03137**.

Appendix A: Emission Calculations

Operation Permit No.-

F049-14038

Plant I D 049-03137

Company Name:

Phend & Brown, Inc.

Plant Location:

Fulton Wabash County Line Road 0.5 MI. N. of SR 114 near Disko, IN 46927

County:

Fulton

Date Received:

November 19, 2001

Permit Reviewer:

Adeel Yousuf/EVP

(insignificant activity):

**** hot oil heater****

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil

@ 0.5 % sulfur, from hot oil heating, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-2, 1.3-4, and 1.3-8.

Criteria Pollutant:

$$\frac{1.4 \text{ MMBtu/hr} \times 8,760 \text{ hr/yr}}{140,000 \text{ Btu/gal} \times 2,000 \text{ lb/ton}} \quad * \text{ Ef (lb/1,000 gal) = (ton/yr)}$$

P M:	2.0 lb/1000 gal =	0.09 ton/yr
P M-10:	1.0 lb/1000 gal =	0.04 ton/yr
S O 2:	69.6 lb/1000 gal =	3.05 ton/yr
N O x:	20.0 lb/1000 gal =	0.88 ton/yr
V O C:	0.20 lb/1000 gal =	0.01 ton/yr
C O:	5.0 lb/1000 gal =	0.22 ton/yr

**** aggregate dryer burner****

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil

@ 0.5 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-2, 1.3-4, and 1.3-7.

Criteria Pollutant:

$$\frac{75.6 \text{ MMBtu/hr} \times 8,760 \text{ hr/yr}}{140,000 \text{ Btu/gal} \times 2,000 \text{ lb/ton}} \quad * \text{ Ef (lb/1,000 gal) = (ton/yr)}$$

P M:	2.0 lb/1000 gal =	4.73 ton/yr
P M-10:	1.0 lb/1000 gal =	2.37 ton/yr
S O 2:	69.6 lb/1000 gal =	164.57 ton/yr
N O x:	20.0 lb/1000 gal =	47.30 ton/yr
V O C:	0.20 lb/1000 gal =	0.47 ton/yr
C O:	5.0 lb/1000 gal =	11.83 ton/yr

The following calculations determine the amount of emissions created by the combustion of #4 fuel oil

@ 0.5 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-2, 1.3-4, and 1.3-6.

Criteria Pollutant:

$$\frac{75.6 \text{ MMBtu/hr} \times 8,760 \text{ hr/yr}}{146,000 \text{ Btu/gal} \times 2,000 \text{ lb/ton}} \quad * \text{ Ef (lb/1,000 gal) = (ton/yr)}$$

P M:	7.0 lb/1000 gal =	15.88 ton/yr
P M-10:	6.02 lb/1000 gal =	13.65 ton/yr
S O 2:	75.0 lb/1000 gal =	170.10 ton/yr
N O x:	20.0 lb/1000 gal =	45.36 ton/yr
V O C:	0.20 lb/1000 gal =	0.45 ton/yr
C O:	5.0 lb/1000 gal =	11.34 ton/yr

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

**** aggregate dryer burner****

The following calculations determine the amount of emissions created by the combustion of waste oil (re-refined)
@ 1.2 % sulfur, 1 % ash, based on 8760 hours of use and
US EPA's AP-42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, and 1.11-3.

Criteria Pollutant:	75.6 MMBtu/hr * 8760 hr/yr 140,000 Btu/gal * 2000 lb/ton	* Ef (lb/1000 gal) = (ton/yr)
P M:	64 lb/1000 gal =	151.37 ton/yr
P M-10:	51 lb/1000 gal =	120.63 ton/yr
S O 2:	176.4 lb/1000 gal =	417.22 ton/yr
N O x:	19.0 lb/1000 gal =	44.94 ton/yr
V O C:	1.0 lb/1000 gal =	2.37 ton/yr
C O:	5.0 lb/1000 gal =	11.83 ton/yr

The maximum potential emissions from the aggregate dryer burner due to fuel combustion are the following:

Criteria Pollutant:		Worst Case Fuel
P M:	151.37 ton/yr	Waste Oil
P M-10:	120.63 ton/yr	Waste Oil
S O 2:	417.22 ton/yr	Waste Oil
N O x:	47.30 ton/yr	No. 2 Distillate Oil
V O C:	2.37 ton/yr	Waste Oil
C O:	11.83 ton/yr	Waste Oil

**** aggregate drying: batch-mix plant ****

The following calculations determine the amount of worst case emissions created by aggregate drying before controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Tables 11.1-2 and 11.1-9 for a batch mix dryer which has the capability of combusting either fuel oil or natural gas:

Pollutant:	Ef	lb/ton x	160 ton/hr x	8,760 hr/yr
		2,000 lb/ton		
Criteria Pollutant:				
P M:	32	lb/ton =	22,425.60 ton/yr	
P M-10:	4.5	lb/ton =	3,153.60 ton/yr	
VOC:	7.6E-03	lb/ton =	5.33 ton/yr	

The VOC emission factor for aggregate drying includes HAP emissions which are assumed to be VOC.

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

**** conveying / handling ****

The following calculations determine the amount of emissions created by material handling, based on 8,760 hours of use and AP-42, Section 13.2.4, Equation 1. The emission factor for calculating PM emissions is calculated as follows:

PM-10 Emissions:

$$E = k \cdot (0.0032) \cdot ((U/5)^{1.3}) / ((M/2)^{1.4})$$

$$= 5.23E-03 \text{ lb PM-10/ton}$$

$$1.11E-02 \text{ lb PM/ton}$$

where k = 0.35 (particle size multiplier for <10um)
0.74 (particle size multiplier for <30um)

U = 12 mph mean wind speed
M = 1.5 material moisture content (%)

$$\frac{160 \text{ ton/hr} \cdot 8,760 \text{ hrs/yr} \cdot E_f \text{ (lb/ton of material)}}{2,000 \text{ lb/ton}} = (\text{ton/yr})$$

Total PM 10 Emissions: 3.66 tons/yr
Total PM Emissions: 7.75 tons/yr

**** unpaved roads ****

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2.2

I. Semi Dump Trucks

$$3.59 \text{ trip/hr} \times 0.03 \text{ mile/trip} \times 2 \text{ (round trip)} \times 8,760 \text{ hr/yr} = 1,887 \text{ mile/yr}$$

$$E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b] / [(M_{dry}/0.2)^c] \cdot [(365-p)/365] \cdot (S/15)$$

$$= 6.20 \text{ lb PM/mile}$$

$$= 1.61 \text{ lb PM-10/mile}$$

where k = 10 (particle size multiplier, PM30) (k= 2.6 for PM10)
s = 4.8 mean % silt content of unpaved plant roads
a = 0.8 Constant for PM30/PM-10
W = 26 tons, average vehicle weight
b = 0.5 Constant for PM30 (b = 0.4 for PM10)
Mdry = 0.2 surface material moisture content, % (default 0.2 (dry conditions) when using rainfall parameter)
c = 0.4 Constant for PM30 (c = 0.3 for PM10)
p = 125 number of days with at least 0.01 in of precipitation per year
S = 10 mph speed limit

$$\frac{6.20 \text{ lb/mi} \times 1,887 \text{ mi/yr}}{2000 \text{ lb/ton}} = 5.85 \text{ tons/yr}$$

$$\frac{1.61 \text{ lb/mi} \times 1,887 \text{ mi/yr}}{2000 \text{ lb/ton}} = 1.52 \text{ tons/yr}$$

Phend & Brown, Inc.
Disko, IndianaOperation Permit No. F049-14038
Plant I D 049-03137**** unpaved roads ****

II. Front End Loader

$$26.67 \text{ trip/hr} \times 0.03 \text{ mile/trip} \times 2 \text{ (round trip)} \times 8,760 \text{ hr/yr} = 14,018 \text{ mile/yr}$$

$$E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b] / [(M_{dry}/0.2)^c \cdot [(365-p)/365]] \cdot (S/15)$$

$$= 4.67 \text{ lb PM/mile}$$

$$= 1.21 \text{ lb PM-10/mile}$$

where k = 10 (particle size multiplier, PM30) (k= 2.6 for PM10)

s = 4.8 mean % silt content of unpaved plant roads

a = 0.8 Constant for PM30/PM-10

W = 23 tons, average vehicle weight

b = 0.5 Constant for PM30 (b = 0.4 for PM10)

Mdry = 0.2 surface material moisture content, % (default 0.2 (dry conditions) when using rainfall parameter)

c = 0.4 Constant for PM30 (c = 0.3 for PM10)

p = 125 number of days with at least 0.01 in of precipitation per year

S = 8 mph speed limit

$$\frac{4.67 \text{ lb/mi} \times 14,018 \text{ mi/yr}}{2000 \text{ lb/ton}} = 32.70 \text{ tons/yr}$$

$$\frac{1.21 \text{ lb/mi} \times 14,018 \text{ mi/yr}}{2000 \text{ lb/ton}} = 8.50 \text{ tons/yr}$$

III. Triaxle Dump Truck

$$3.8 \text{ trip/hr (in)} \times 0.03 \text{ mile/trip (in)} \times 8,760 \text{ hr/yr} = 999 \text{ mile/yr}$$

$$7.62 \text{ trip/hr (out)} \times 0.065 \text{ mile/trip (out)} \times 8,760 \text{ hr/yr} = 4,339 \text{ mile/yr}$$

$$\text{Total} = 5337.47 \text{ mile/yr}$$

$$E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b] / [(M_{dry}/0.2)^c \cdot [(365-p)/365]] \cdot (S/15)$$

$$= 5.01 \text{ lb PM/mile}$$

$$= 1.30 \text{ lb PM-10/mile}$$

where k = 10 (particle size multiplier, PM30) (k= 2.6 for PM10)

s = 4.8 mean % silt content of unpaved plant roads

a = 0.8 Constant for PM30/PM-10

W = 17 tons, average vehicle weight

b = 0.5 Constant for PM30 (b = 0.4 for PM10)

Mdry = 0.2 surface material moisture content, % (default 0.2 (dry conditions) when using rainfall parameter)

c = 0.4 Constant for PM30 (c = 0.3 for PM10)

p = 125 number of days with at least 0.01 in of precipitation per year

S = 10 mph speed limit

$$\frac{5.01 \text{ lb/mi} \times 5,337 \text{ mi/yr}}{2000 \text{ lb/ton}} = 13.38 \text{ tons/yr}$$

$$\frac{1.30 \text{ lb/mi} \times 5,337 \text{ mi/yr}}{2000 \text{ lb/ton}} = 3.48 \text{ tons/yr}$$

Total PM Emissions From Unpaved Roads = 51.93 tons/yr
Total PM-10 Emissions From Unpaved Roads = 13.50 tons/yr

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

**** storage ****

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

Material	Silt Content (wt %)	Pile Size (acres)	Storage Capacity (tons)	P M Emissions tons/yr	P M-10 Emissions tons/yr
Sand	0.5	0.138	3,000	0.01	0.01
Stone	1.4	0.321	7,000	0.09	0.03
Limestone	1.2	0.344	7,500	0.09	0.03
B. F. Slag	1.0	0.207	4,500	0.04	0.02
RAP	1.0	0.184	3,200	0.04	0.01
Total				0.28	0.10

Sample Calculation:

$$\begin{aligned}
 E_f &= 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15) \\
 &= 0.58 \text{ lb/acre/day} \\
 \text{where } s &= 0.5 \% \text{ silt} \\
 p &= 125 \text{ days of rain greater than or equal to 0.01 inches} \\
 f &= 15 \% \text{ of wind greater than or equal to 12 mph}
 \end{aligned}$$

$$E_p (\text{storage}) = E_f \cdot (\text{Pile Size in acres}) \cdot (365 \text{ day/yr})$$

$$\text{Pile Size} = 0.14 \text{ acres}$$

$$PM = 0.01 \text{ tons/yr}$$

$$P M-10:$$

$$35\% \text{ of } PM =$$

$$0.01 \text{ tons/yr}$$

****cold mix VOC storage emissions ****

Liquid Binders used in the production of cold mix asphalt at this source consist of medium core, slow core, emulsified and gelled asphalt.

Worst case binder is: Cut back asphalt medium cure, containing a maximum of 28.6% of the liquid binder by weight of VOC (solvent) and 70% by weight of VOC (solvent) evaporating.

$$\text{VOC Emission Factor} = 0.7 \text{ weight percent flash-off of cold mix}$$

$$\text{Potential Throughput (tons/yr)} = 1,401,600 \text{ tons/yr stockpile mix}$$

$$\text{Potential VOC Emissions (tons/yr)} = \text{Potential Throughput (tons/yr)} \cdot \text{VOC Emission Factor (wt\% flash-off)}$$

$$\text{Potential VOC Emissions} = 9,811.20 \text{ tons/yr}$$

**** summary of source emissions before controls ****

Criteria Pollutants:

$$P M: 22,637.01 \text{ ton/yr}$$

$$P M-10: 3,291.53 \text{ ton/yr}$$

$$S O_2: 420.27 \text{ ton/yr}$$

$$N O_x: 48.18 \text{ ton/yr}$$

$$V O C: 9,818.90 \text{ ton/yr}$$

$$C O: 12.05 \text{ ton/yr}$$

(VOCs include HAPs from aggregate drying operation)

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

**** source emissions after controls ****

In order to qualify for the FESOP program, this source must limit SO₂ emissions to 99.0 tons per year. Consequently, SO₂ emissions from the aggregate dryer must be limited to 95.98 tons per year (99.0 ton/yr - 3.02 ton/yr from the hot oil heater).

* Emissions of PM and PM-10 from aggregate drying operations are controlled with a 99.900 % control efficiency.

**** source emissions after controls ****

The following calculations determine the amount of emissions created by No.2 distillate fuel oil @ 0.5 % sulfur based on a fuel usage limitation of 2,601,999 gal/yr:

No. 2 Distillate Oil: $\frac{2,601,999 \text{ gal/yr}}{2,000 \text{ lb/ton}}$ * Ef (lb/1,000 gal) = (ton/yr)

P M:	2.0 lb/1000 gal =	2.60E-03 ton/yr *
P M-10:	1.0 lb/1000 gal =	1.30E-03 ton/yr *
S O 2:	69.6 lb/1000 gal =	90.52 ton/yr
N O x:	20.0 lb/1000 gal =	26.02 ton/yr
V O C:	0.2 lb/1000 gal =	0.26 ton/yr
C O:	5.0 lb/1000 gal =	6.50 ton/yr

The following calculations determine the amount of emissions created by No. 4 residual oil @ 0.5 % sulfur based on a fuel usage limitation of 2,413,763 gal/yr:

No. 4 Residual Oil: $\frac{2,413,763 \text{ gal/yr}}{2000 \text{ lb/ton}}$ * Ef (lb/1000 gal) = (ton/yr)

P M:	7.0 lb/1000 gal =	8.45E-03 ton/yr *
P M-10:	6.0 lb/1000 gal =	7.27E-03 ton/yr *
S O 2:	75.0 lb/1000 gal =	90.52 ton/yr
N O x:	20.0 lb/1000 gal =	24.14 ton/yr
V O C:	0.2 lb/1000 gal =	0.24 ton/yr
C O:	5.0 lb/1000 gal =	6.03 ton/yr

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

The following calculations determine the amount of emissions created by waste oil @ 1.2 % sulfur based on a fuel usage limitation of 1,026,325 gal/yr:

$$\text{Waste Oil: } \frac{1,026,325 \text{ gal/yr}}{2000 \text{ lb/ton}} * \text{Ef (lb/1000 gal)} = (\text{ton/yr})$$

P M:	64.0 lb/1000 gal =	0.03 ton/yr *
P M-10:	51.0 lb/1000 gal =	0.03 ton/yr *
S O 2:	176.4 lb/1000 gal =	90.52 ton/yr
N O x:	19.0 lb/1000 gal =	9.75 ton/yr
V O C:	1.0 lb/1000 gal =	0.51 ton/yr
C O:	5.0 lb/1000 gal =	2.57 ton/yr

Criteria Pollutant:

P M:	0.03 ton/yr	Worst Case Fuel
P M-10:	0.03 ton/yr	Waste Oil
S O 2:	90.52 ton/yr	Waste Oil
N O x:	26.02 ton/yr	All Fuel Oils
V O C:	0.51 ton/yr	No. 2 Distillate Oil
C O:	6.50 ton/yr	Waste Oil
		No. 2 Distillate Oil

**** source emissions after controls ****

Fuel Usage Limitations

Fuel Oil: #4 fuel oil

$$\frac{90.52 \text{ tons SO}_2/\text{year limited}}{170.10 \text{ tons SO}_2/\text{year potential}} * 4,536 \frac{\text{Kgals}}{\text{year potential}} = 2413.763 \frac{\text{Kgals}}{\text{year limited}}$$

Fuel equivalence limit for #2 residual fuel oil based on SO2 emissions from #4 distillate fuel oil:

$$= \frac{164.57 \text{ #2 F.O. potential emis. (ton/yr)}}{4730.40 \text{ #2 F.O. potential usage (kgal/yr)}} / \frac{170.10 \text{ #4 F.O. potential emissions (ton/yr)}}{4536.00 \text{ #4 F.O. potential usage (kgal/yr)}} = 0.9277 \frac{\text{# 4 F.O.}}{\text{Kgal # 2 F.O. burned}}$$

Fuel equivalence limit for waste fuel oil based on SO2 emissions from #4 residual fuel oil:

$$= \frac{417.22 \text{ Waste F.O. potential emis. (ton/yr)}}{4730.40 \text{ Waste F.O. potential usage (kgal/yr)}} / \frac{170.10 \text{ #4 F.O. potential emissions (ton/yr)}}{4536.00 \text{ #4 F.O. potential usage (kgal/yr)}} = 2.3520 \frac{\text{# 4 F.O.}}{\text{Kgal Waste F.O.. burned}}$$

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

**** source emissions after controls ****

aggregate drying:		nonfugitive	
P M:	22,577 ton/yr x	0.10% emitted after controls =	22.58 ton/yr
P M-10:	3,274 ton/yr x	0.10% emitted after controls =	3.27 ton/yr
conveying & handling:		fugitive	
P M:	7.70 ton/yr x	50% emitted after controls =	3.85 ton/yr
P M-10:	3.66 ton/yr x	50% emitted after controls =	1.83 ton/yr
unpaved roads:		fugitive	
P M:	51.93 ton/yr x	50% emitted after controls =	25.96 ton/yr
P M-10:	13.50 ton/yr x	50% emitted after controls =	6.75 ton/yr
storage piles:		fugitive	
P M:	0.28 ton/yr x	50% emitted after controls =	0.14 ton/yr
P M-10:	0.10 ton/yr x	50% emitted after controls =	0.05 ton/yr
VOC: Limited Emissions = (99.0 - VOC emissions from aggregate drying and fuel Combustion)			93.15 ton/yr

**** summary of source emissions after controls ****

Criteria Pollutant:	Non-Fugitive	Fugitive	Total
PM:	22.66 ton/yr	29.95 ton/yr	52.62 ton/yr
PM-10:	3.32 ton/yr	8.63 ton/yr	11.95 ton/yr
S O 2:	93.57 ton/yr	0.00 ton/yr	93.57 ton/yr
N O x:	26.90 ton/yr	0.00 ton/yr	26.90 ton/yr
V O C:	5.85 ton/yr	93.15 ton/yr	99.00 ton/yr
C O:	6.72 ton/yr	0.00 ton/yr	6.72 ton/yr

Phend & Brown, Inc.
Disko, IndianaOperation Permit No. F049-14038
Plant I D 049-03137**326 IAC 7 Compliance Calculations:**

The following calculations determine the maximum sulfur content of distillate fuel oil (No. 2 Oil) allowable by 326 IAC 7:

$$\begin{array}{rcl} 0.5 \text{ lb/MMBtu} \times 140,000 \text{ Btu/gal} & = & 70 \text{ lb/1000gal} \\ 70 \text{ lb/1000gal} / 142 \text{ lb/1000 gal} & = & 0.5 \% \end{array}$$

Sulfur content must be less than or equal to 0.5% to comply with 326 IAC 7.

The following calculations determine the maximum sulfur content of residual oil (No. 4 Oil) allowable by 326 IAC 7:

$$\begin{array}{rcl} 0.5 \text{ lb/MMBtu} \times 146,000 \text{ Btu/gal} & = & 73 \text{ lb/1000gal} \\ 73 \text{ lb/1000gal} / 150 \text{ lb/1000 gal} & = & 0.5 \% \end{array}$$

Sulfur content must be less than or equal to 0.5% to comply with 326 IAC 7.

The following calculations determine the maximum sulfur content of residual oil (Waste Oil) allowable by 326 IAC 7:

$$\begin{array}{rcl} 1.6 \text{ lb/MMBtu} \times 140,000 \text{ Btu/gal} & = & 224 \text{ lb/1000gal} \\ 224 \text{ lb/1000gal} / 150 \text{ lb/1000 gal} & = & 1.5 \% \end{array}$$

Sulfur content must be less than or equal to 1.5% to comply with 326 IAC 7.

326 IAC 6-3-2 Compliance Calculations:

The following calculations determine compliance with 326 IAC 6-3-2 for process weight rates in excess of 30 tons per hour:

$$\text{limit} = 55 * (160^{0.11}) - 40 = 56.12 \text{ lb/hr or } 245.81 \text{ ton/yr}$$

PM emissions from the aggregate dryer are controlled to 5.12 pounds per hour < 56.12 pounds per hour. will comply

PM-10 Emission Limit:

$$(99.0 \text{ tons PM}_{10}/\text{yr} - 8.67 \text{ tons PM}_{10}/\text{yr for non-dryer emissions}) = 90.33 \text{ tons / year}$$

$$= 20.6233 \text{ lb/hr, based on 8,760 hr/yr}$$

$$= 0.1289 \text{ lb PM}_{10}/\text{ton asphalt, based on 160 tons asphalt /hr}$$

PM10 emissions from the aggregate dryer are controlled to 3.27 tons per year < 98.96 tons per year will comply

40 CFR Part 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Plants) Compliance Calculations:

The following calculations determine compliance with NSPS, which limits stack emissions from asphalt plants to 0.04 gr/dscf:

$$\frac{22.58 \text{ ton/yr} * 2000 \text{ lb/ton} * 7000 \text{ gr/lb}}{525,600 \text{ min/yr} * 34,291 \text{ dscf/min}} = 0.018 \text{ gr/dscf} \quad (\text{will comply})$$

Allowable particulate emissions under NSPS equate to 51.496 tons per year. 11.76 lbs/hr

Note:

$$\begin{array}{l} \text{SCFM} = 46,584 \text{ acfm} * (460 + 68) * (1 - 0.045) / (460 + 225) \\ = 34,291 \text{ scfm (assumed 4.5\% moisture)} \end{array}$$

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

Hazardous Air Pollutants (HAPs)

** aggregate dryer burner**

The following calculations determine the amount of HAP emissions created by the combustion of distillate fuel oil before & after controls @ 0.5% sulfur, from the aggregate dryer burner, based on 8760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Table 1.3-10.

Hazardous Air Pollutants (HAPs): $\frac{75.6 \text{ MMBtu/hr} \times 8760 \text{ hr/yr}}{2,000 \text{ lb/ton}}$ * Ef (lb/10¹² Btu) = (ton/yr)

		Potential To Emit	Limited Emissions	
Arsenic:	4 lb/10 ¹² Btu =	8.28E-05 ton/yr	2.48E-07 ton/yr	ton/yr
Beryllium:	3 lb/10 ¹² Btu =	1.10E-04 ton/yr	3.31E-07 ton/yr	ton/yr
Cadmium:	3 lb/10 ¹² Btu =	1.10E-04 ton/yr	3.31E-07 ton/yr	ton/yr
Chromium:	3 lb/10 ¹² Btu =	1.10E-04 ton/yr	3.31E-07 ton/yr	ton/yr
Lead:	9 lb/10 ¹² Btu =	3.68E-05 ton/yr	1.10E-07 ton/yr	ton/yr
Manganese:	6 lb/10 ¹² Btu =	5.52E-05 ton/yr	1.66E-07 ton/yr	ton/yr
Mercury:	3 lb/10 ¹² Btu =	1.10E-04 ton/yr	3.31E-07 ton/yr	ton/yr
Nickel:	3 lb/10 ¹² Btu =	1.10E-04 ton/yr	3.31E-07 ton/yr	ton/yr
Total HAPs =		7.27E-04 ton/yr	2.18E-06 ton/yr	ton/yr

* * aggregate drying: batch-mix plant * *

The following calculations determine the amount of HAP emissions created by aggregate drying before & after controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Table 11.1-9 for a batch mix dryer which can be fired with either fuel oil or natural gas. The HAP emission factors represent the worst case emissions (natural gas combustion).

Pollutant: $\frac{\text{Ef lb/ton} \times 160 \text{ ton/hr} \times 8760 \text{ hr/yr}}{2000 \text{ lb/ton}}$

		Potential To Emit	Limited Emissions	
Acetaldehyde:	3.2E-04 lb/ton =	0.22 ton/yr	0.22 ton/yr	ton/yr
Benzene:	2.8E-04 lb/ton =	0.20 ton/yr	0.20 ton/yr	ton/yr
Ethylbenzene:	2.2E-03 lb/ton =	1.54 ton/yr	1.54 ton/yr	ton/yr
Formaldehyde:	7.4E-04 lb/ton =	0.52 ton/yr	0.52 ton/yr	ton/yr
PAH (total) HAPs:	1.1E-04 lb/ton =	0.08 ton/yr	0.08 ton/yr	ton/yr
Quinone:	2.7E-04 lb/ton =	0.19 ton/yr	0.19 ton/yr	ton/yr
Toluene:	1.0E-03 lb/ton =	0.70 ton/yr	0.70 ton/yr	ton/yr
Xylene:	2.7E-03 lb/ton =	1.89 ton/yr	1.89 ton/yr	ton/yr
Total HAPs =		5.34 ton/yr	5.34 ton/yr	ton/yr

* See AP-42, Section 11.1, Table 11.1-9 for complete listing of PAH HAPs.

Phend & Brown, Inc.
Disko, Indiana

Operation Permit No. F049-14038
Plant I D 049-03137

**** summary of source HAP emissions potential to emit ****

Hazardous Air Pollutants (HAPs):

Acetaldehyde:	0.224 ton/yr
Arsenic:	0.001 ton/yr
Benzene:	0.196 ton/yr
Beryllium:	0.001 ton/yr
Cadmium:	0.000 ton/yr
Chromium:	0.001 ton/yr
Ethylbenzene:	1.542 ton/yr
Formaldehyde:	0.519 ton/yr
Lead:	0.000 ton/yr
Manganese:	0.000 ton/yr
Mercury:	0.000 ton/yr
Nickel:	0.000 ton/yr
Quinone:	0.189 ton/yr
Toluene:	0.701 ton/yr
PAH (total) HAPs:*	0.077 ton/yr
Xylene:	1.892 ton/yr
Total	5.344 ton/yr

**** summary of source HAP limited emissions ****

Hazardous Air Pollutants (HAPs):

Acetaldehyde:	0.224 ton/yr
Arsenic:	0.000 ton/yr
Benzene:	0.196 ton/yr
Beryllium:	0.000 ton/yr
Cadmium:	0.000 ton/yr
Chromium:	0.000 ton/yr
Ethylbenzene:	1.542 ton/yr
Formaldehyde:	0.519 ton/yr
Lead:	0.000 ton/yr
Manganese:	0.000 ton/yr
Mercury:	0.000 ton/yr
Nickel:	0.000 ton/yr
Quinone:	0.189 ton/yr
Toluene:	0.701 ton/yr
PAH (total) HAPs:*	0.077 ton/yr
Xylene:	1.892 ton/yr
Total	5.341 ton/yr